

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”,  
GREENHEART MUSIC LIMITED, a United  
Kingdom Limited Company, and  
GREENHEART MUSIC LIMITED, an  
Antigua and Barbuda Limited Company,

Civil Action No. 1:20-cv-07103-JGK

Plaintiffs,

-against-

DONALD J. TRUMP and DONALD J.  
TRUMP FOR PRESIDENT, INC.,

Defendants.

**DECLARATION OF DARREN W. SAUNDERS  
IN SUPPORT OF DEFENDANTS’ MOTION TO DISMISS THE COMPLAINT**

I, Darren W. Saunders, declare:

1. I am a Partner with Peroff Saunders, P.C., attorneys for Defendants Donald J. Trump and Donald J. Trump For President, Inc. (together, “Defendants”). I am a member in good standing of this Court. This Declaration is submitted in connection with Defendants’ Motion to Dismiss the Plaintiffs’ Complaint pursuant to Rule 12(b)(6). I have personal knowledge of the facts herein and would be competent to testify to them if called to do so.

2. Attached hereto as **Exhibit 1** is a USB flash drive containing a true and correct copy of Plaintiffs’ song “Electric Avenue,” purchased and downloaded from the official online store of Plaintiff Edmond Grant p/k/a “Eddy Grant,” located at: <http://eddygrant.com/> (last visited Nov. 11, 2020).

3. Attached hereto as **Exhibit 2** is a USB flash drive containing a true and correct copy of the Animation video, downloaded from the following YouTube link:  
<https://www.youtube.com/watch?v=aEEVimV3eF4> (last visited Nov. 11, 2020).

4. Attached hereto as **Exhibit 3** is a true and correct copy of a website screenshot of a digitally archived version of Defendant Donald J. Trump's Tweet, as referenced in paragraph 35 of the Complaint. The screenshot shows the Tweet as of April 13, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 11, 2020

/s/ Darren W. Saunders  
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Darren W. Saunders